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Attorney for Defendant
HOMY HONG-MING HSU

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

HOMY HONG-MING HSU,

Defendant.

Case No. CR-11-0488-RS

**STIPULATION AND [PROPOSED]
ORDER MODIFYING CONDITIONS
OF PRETRIAL RELEASE**

Hon. Nathanael Cousins, United States
Magistrate Judge

Plaintiff United States of America, by and through its counsel of record, and
defendant Homy Hsu ("Mr. Hsu"), by and through his counsel of record, hereby
stipulate and request an order from the Court modifying the conditions of Mr. Hsu's
pretrial release as follows:


The parties agree and request that the condition of pretrial release restricting
Mr. Hsu's travel to the Northern District of California be modified for the limited
purpose of allowing Mr. Hsu to travel to Las Vegas, Nevada, between October 28,
2012 and November 4, 2012. The purpose of this travel is so that Mr. Hsu can
attend the SEMA trade show, which is a very important trade show in the auto parts
industry. It is stipulated and agreed that Mr. Hsu will not travel outside the District

1 of Nevada except as necessary to travel between the Northern District of California
 2 and the District of Nevada. The location monitoring and curfew restrictions of Mr.
 3 Hsu's pretrial release will be suspended during this travel.

4 Counsel for Mr. Hsu has attempted to consult with Supervising Pretrial
 5 Services Officer Allen Lew, who has agreed in the past to similar modifications to
 6 permit out-of-district travel, subject to the conditions set forth above. However,
 7 counsel is informed that Officer Lew is out of the office until Thursday, October
 8 18, 2012. This request is made prior to Supervising Pretrial Services Officer Lew's
 9 return to the office in order to facilitate Mr. Hsu's travel planning and to permit the
 10 Court sufficient time to review this request in advance of Mr. Hsu's desired travel
 11 dates.

12
 13 IT IS SO STIPULATED.

14
 15 Dated: October 16, 2012


 JACKLIN CHOU LEM
 HOWARD J. PARKER
 Antitrust Division
 U.S. Department of Justice

17
 18 Attorneys for Plaintiff United States

19
 20 Dated: October 16, 2012

/s/Becky Walker James
 BECKY WALKER JAMES
 Law Offices of Becky Walker James

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 22 Attorney for Defendant Homy Hsu

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 24 GOOD CAUSE APPEARING, IT IS SO ORDERED.

25 Dated: 10/16/12


 HON. NATHANAELE COUSINS RICHARD SEEBORG
 United States Magistrate Judge
 District